

Defendants.

Case No. 19-CV-06137-BP

**DEFENDANT ST. JOSEPH PUBLIC LIBRARY’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S INTERROGATORIES AND
FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

COMES NOW Defendant St. Joseph Public Library (“Defendant”) by and through its attorneys of record and moves this Court for an extension of time to respond to Plaintiff’s First Interrogatories and First Requests for Production of Documents. Defendant states the following in support of this Motion:

1. Plaintiff served her First Interrogatories and First Requests for Production of Documents on or about April 30, 2020 (ECF No. 60).
2. Defendant's responses to Plaintiff's First Interrogatories and First Requests for Production of Documents were originally due June 1, 2020.
3. Defendant requests an additional fourteen (14) days, or until June 15, 2020, to respond to Plaintiff's First Interrogatories and First Requests for Production of Documents. This request is made due to the recent orders to shut down various facilities including Defendant Library which have caused significant disruptions to the business operations of Defendant.
4. Counsel for Defendant has conferred with Plaintiff regarding this requested extension and Plaintiff has no objection to this requested extension.

5. No prior extensions of time have been requested to this deadline.

6. Defendant is constrained to make this request out of necessity and not for the purpose of causing any unnecessary delay.

WHEREFORE, Defendant St. Joseph Public Library requests that this Court grant it an additional fourteen (14) days up to and including the 15th day of June, 2020 within which to provide its responses to Plaintiff's First Interrogatories and First Requests for Production of Documents.

Respectfully submitted,

McANANY, VAN CLEAVE & PHILLIPS, P.A.
10 E. Cambridge Circle Drive, 300
Kansas City, Kansas 66103
Telephone: (913) 371-3838
Facsimile: (913) 371-4722
E-mail: ggoheen@mvplaw.com

By: /s/ Gregory P. Goheen
Gregory P. Goheen #58119

Attorneys for Defendant St. Joseph Public Library

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of June, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Stacy Arnold
500 Westover Drive #11589
Sanford, NC 27330
Plaintiff, *pro se*

Mark Beam-Ward
Beam-Ward, Kruse, Wilson & Fletes, LLC
8645 College Boulevard, Suite 250
Overland Park, KS 66210
Attorneys for Defendant Roger Clary

/s/ Gregory P. Goheen